

John Hadden

LAW OFFICES

ZUCKERT, SCOUTT, RASENBERGER & DE

BRAWNER BUILDING

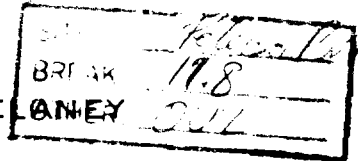
888 SEVENTEENTH STREET, N. W.

WASHINGTON, D. C. 20006-3959

TELEPHONE: (202) 298-8660

CABLE: ZSRLAW

TELEX: 89648



COATES LEAR (1915-1963)
EUGENE M. ZUCKERT
JERROLD SCOUTT, JR.
RAYMOND J. RASENBERGER
EDWARD N. DELANEY
BLAKE T. NEWTON, JR.
LAWRENCE G. MERTHAN
MARVIN S. LIEBERMAN
T. EDWARD BRASWELL, JR.
AARON J. RACUSIN
FRANK J. COSTELLO
EDGAR T. BELLINGER
RALPH L. KISSICK
JAMES L. DEVAL
ALLEN L. LEAR
RICHARD M. HALL
RANDY M. MOTT
WILLIAM H. CALLAWAY, JR.
RACHEL B. TRINDER
CHARLES J. SIMPSON, JR.
DAVID R. RIVERO
ANN L. RASENBERGER
SCOTT J. SCHWARZ
MARYBETH C. ROBB
EVAN M. MIGOAIL

OF COUNSEL
MARVIN B. DURNING

RECEIVED

FEB 9 1983

WASTE RESPONSE &
COMPLIANCE BRANCH

February 7, 1983

Mr. William Hedeman
U.S. Environmental Protection
Agency
401 M Street, S.W.
East Tower, Rm. G200
Washington, D.C. 20460

Re: Peterson-Puritan Site

Dear Mr. Hedeman:

In connection with the above site proposed in the National Priority List, we represent Peterson-Puritan Corporation. While we will be filing detailed comments on February 28, 1983, we feel that a matter of some urgency requires prompt attention by your office.

The basic hydrology investigation used by EPA to assess the site and to identify Peterson-Puritan as a "responsible party" has several critical omissions. These holes in data collection are being partially filled by a company-funded study, which we have requested be certified as a response cost consistent with the National Contingency Plan. Chief among these holes is the paucity of data on other sources of groundwater contamination, including the industrial sewer line, the J.M. Mills landfill and the Dexter Quarry. The company field study will cover the sewer, but access to the other two sites has been denied by their owners. If necessary, Peterson-Puritan will join them as defendants in pending state court litigation and move for access to the sites in court papers.

PETERSON PURITAN
1003348

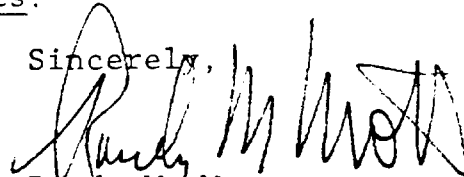
3354

Mr. William Hedeman
February 7, 1983
Page Two

Rather than take these time-consuming and expensive steps -- which we believe are compensable costs under CERCLA -- it makes sense for the EPA FIT contractor (NUS) to take additional samples at these sites. The quarry requires one deep well (150-175 feet) with a complete mass spec priority pollution analysis and the Mills landfill already has several monitoring wells on site which need the same analysis. Both sites received hazardous waste and are hydrologically connected to the Lincoln wellfield based on USGS and EPA contractor reports.

We would be happy to meet with headquarters and Regional I staff from the program office to discuss this idea. Actions at the site of contamination cannot be completed without these additional analyses; the questions of rehabilitation of the wellfield and aquifer restoration necessitate getting this data even if EPA was not interested in identifying additional responsible parties.

Sincerely,



Randy M. Mott

cc: Joel Blumstein, Esq.
John Hackler ✓

PETERSON PURITAN
1003349

3355